

Bauer, Jaime (DEQ)

From: Bauer, Jaime (DEQ)
Sent: Friday, March 11, 2011 4:06 PM
To: 'Bill Purcell'
Subject: RE: Outstanding App Issues and other Clarifications

Thanks, Bill.

The question came up regarding tanks on site during the internal review. Specifically, the question had to do with if the petroleum program regulated the tanks holding fish oil and my determination was that it does not. Therefore, any release that would occur from these tanks would fall under VPDES if that were to ever happen.

Jaime L. Bauer | Environmental Specialist II | DEQ Piedmont Regional Office | 804.527.5015 | jaime.bauer@deq.virginia.gov

From: Bill Purcell [mailto:bpurcell@OmegaProteinInc.com]
Sent: Friday, March 11, 2011 1:07 PM
To: Bauer, Jaime (DEQ)
Cc: Bill Purcell
Subject: RE: Outstanding App Issues and other Clarifications

Tank No.	Description	Gallons
01	Fish Oil Production	15,645
02	Fish Oil Production	24,000
03	Fish Oil Production	24,000
04	Fish Oil Production	20,000
05	Fish Oil	132,193
06	Fish Oil	58,752
07	Fish Oil	508,144
08	Fish Oil	308,378
09	Fish Oil	293,760
10	Fish Oil	93,861
24	Fish Oil	308,378
27	Fish Oil	508,144
47	Fish Oil	308,378
76	Fish Oil	508,144
F11	Fish Oil	17,626
F12	Fish Oil	23,500

Here you go. What is this for?

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From: Bauer, Jaime (DEQ) [mailto:Jaime.Bauer@deq.virginia.gov]
Sent: Friday, March 11, 2011 12:02 PM
To: Bill Purcell
Subject: RE: Outstanding App Issues and other Clarifications

Bill,

According to DEQ records that there are 9 ASTs on the site that store petroleum and are regulated under that program. How many ASTs are on site that store fish oil and what are the capacities?

Jaime

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From: Bill Purcell [mailto:bpurcell@OmegaProteinInc.com]
Sent: Friday, March 11, 2011 7:39 AM
To: Bauer, Jaime (DEQ)
Subject: RE: Outstanding App Issues and other Clarifications

You are talking about something that happened 15-16 years ago.....Talked to Asst. GM and our metal fabricator may have the plans at his office. I think it is 16" carbon steel pipe with perforations to diffuse the flow. Why is this coming up?

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From: Bauer, Jaime (DEQ) [mailto:Jaime.Bauer@deq.virginia.gov]
Sent: Thursday, March 10, 2011 4:05 PM
To: Bill Purcell
Subject: RE: Outstanding App Issues and other Clarifications

Bill,

I am trying to locate a copy of the specifications for the diffuser on Outfall 002 as built. Do you happen to have a copy of that? I have scoured our files, and can't seem to find anything.

Jaime

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From: Bill Purcell [mailto:bpurcell@OmegaProteinInc.com]
Sent: Thursday, March 10, 2011 8:12 AM
To: Bauer, Jaime (DEQ)
Cc: Bill Purcell
Subject: RE: Outstanding App Issues and other Clarifications

With regards to the fish hold we have no accurate means to know how much refrigeration water is on at any given time. Engineers operate their vessels differently in different weather and fishing conditions and the fish hold shape is highly irregular which does not lend itself to a simple volumetric calculation. Then there is the amount of refrigeration water that is retained in the fish after pumping off. It is a question we are asking ourselves.

We would bring the flow back to the DAF to remove algae and then to the strippers then back to UV and 002. I hope we never need to do this and it highly unlikely we will. I think we have enough redundancy in our strippers that it won't become an issue. Chances are if the strippers are down then we wouldn't be processing (no power, no steam etc)

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From: Bauer, Jaime (DEQ) [mailto:Jaime.Bauer@deq.virginia.gov]
Sent: Wednesday, March 09, 2011 4:03 PM
To: Bill Purcell
Subject: RE: Outstanding App Issues and other Clarifications

Bill,

Thanks for getting the responses back to me so quickly. I have two questions. First in item 5 below, you mention keeping the UV in case the ponds are used as emergency storage. Just to make sure I completely understand...If the ponds are used for emergency storage, the wastewater will be run through the Ammonia Strippers after the "emergency" situation is resolved. Any water that is stored in the ponds will have to be disinfected because of the wildlife. Will the water go from the emergency storage ponds to the ammonia strippers and then be discharged? Does that mean you will need to keep the DAF as well? If you can, please describe the flow as it will occur if the ponds are used for emergency storage.

In item 11 you have provided the capacity of the boat holds in terms of fish. I was looking for volume of refrigeration water they can hold. Is that information available?

Jaime

From: Bill Purcell [mailto:bpurcell@OmegaProteinInc.com]
Sent: Mon 3/7/2011 2:56 PM
To: Bauer, Jaime (DEQ)
Cc: Bill Purcell
Subject: RE: Outstanding App Issues and other Clarifications

- 1) I just need to confirm that as Environmental Manager, you meet the signatory authority for the application. As required by 9 VAC 25-31-110, *All permit application shall be signed as follows: 1. For a corporation: by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means: (i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy-making or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions that govern the operation of the regulated facility, including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures*

Yes , DEQ has a letter on file designating me as the signatory authority.

2) In the Form2C application, Part II B, Outfall 995: The average flow is listed as 8.5 MGD. However, in Section C the flow for Outfall 995 is listed as 4.2 MGD. Please reconcile
The 8.5 MGD came from the old application and it should have been changed to reflect current flows. I copied from the last application and apparent the person that prepared it before that did the same thing. New evaporators were installed in 1998 and the flow reduced after that

3) Outfall flows listed in the Form2C application do not match the flows on the facility diagram. Please reconcile.

995 Ave flow should be 2.3 mgd
995 max flow 4.2 mgd (from pump curve)
002 Ave flow .18 mgd

4) It is noted that the flows reported with the Jan 2011 application have been substantially reduced when compared to flows listed in the 2005 permit fact sheet. Can you provide some clarification as to why the flow have changed?

Outfall 002 long term average: 0.210 MGD vs 0.178 MGD

Outfall 995 max 30 day average: 7.1 MGD vs 3.188 MGD

long term average: 5.64 MGD vs. 2.377 MGD

Flows have changed for 002 because we re-use treated water in the plant (cooling water, vacuum pump seal water, plant wash down water) that we did not do in the past. As a result the flows from 002 have been reduced. Flows from 995 are the hours of operation times the flow from the pump curve. The higher flows were from the previous evaporators that had 4 pumps for cooling water. Current flows are as you indicate in item 4. The new evaporators were installed in 1998

5) In the Form2C application, Part II B, Outfall 002: Under treatment, the code for disinfection (2-H) is listed. With the proposed changes, do you intend to keep the UV or other disinfection method as part of the treatment? My understanding was that everything after the ammonia strippers was being removed. We do not plan to disinfect from the strippers but if we use the ponds as emergency back up we would direct the flows through the UV unit

6) In the Form 2C application, Outfall 002 Part V A.1.c: No data for TOC was submitted. Please provide information regarding TOC. If you believe that there has been no changes at the plant that would affect the TOC concentrations, you can submit data from the previous application.

Sampling from 6/9/2010

TOC

995

BDL

002

12 mg/L

No changes that would impact TOC

7) In the Form2C application, Outfall 002 Part V B.1.k: No data for Sulfate was provided but is marked as believed present. Please reconcile.

The will be no sulfate with new treatment (we will be using CO2 and not H2SO4 and no aluminum sulfate) Should be marked believed absent

8) In the Form2C application, Outfall 995 Part V A.1.a-e: Max 30 Day and Long Term Average were left blank. If this information is available, these fields should be completed.

This information is not available One sample was collected for the influent and effluent

9) In the Form2C application, Outfall 995 Part V B.1.d: The box is marked as believed absent, however, a concentration of fecal coliform is reported (340 CFU/100mL). Please reconcile.

Did not know how to say we do not add fecal coliforms.....there was influent and effluent data and the effluent was lower than influent so we are getting die off or at least no increase for the This is non-contact cooling water

Other Questions

- 10) Does Omega receive any waste products from seafood processors? We received a registration statement for the Seafood General Permit that indicated that waste was sent to Omega. Upon following up with the owner, it turns out that they in the past their waste went to Omega but doesn't anymore.

No we do not receive waste products from seafood processors. Probably 20 years ago we would take fish cuttings from food fish processors but we have no mechanism to handle that waste any more.

- 11) How many fishing vessels does Omega operate? What is the capacity of the fish holds on each? We fish with 10 vessels.

	Million Fish
Tideland	2.2
Conrad	1.2
Dempster	1.2
Kimberly	1.4
Lancaster	1.2
Reedville	1.2
Calcaseau Pass	1.4
Smith Island	1.2
Sugglers Pt	1.2
Tangier Island	1.2

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From: Bauer, Jaime (DEQ) [mailto:Jaime.Bauer@deq.virginia.gov]
Sent: Monday, March 07, 2011 9:51 AM
To: Bill Purcell
Subject: Outstanding App Issues and other Clarifications

Hi, Bill,

As I mentioned in my voice message, there are few items that need reconciling regarding the application and draft permit process. I have listed those items below.

- 12) I just need to confirm that as Environmental Manager, you meet the signatory authority for the application. As required by 9 VAC 25-31-110, *All permit application shall be signed as follows: 1. For a corporation: by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means: (i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy-making or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions that govern the operation of the regulated facility, including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.*

- 13) In the Form2C application, Part II B, Outfall 995: The average flow is listed as 8.5 MGD. However, in Section C the flow for Outfall 995 is listed as 4.2 MGD. Please reconcile.
- 14) Outfall flows listed in the Form2C application do not match the flows on the facility diagram. Please reconcile.
- 15) It is noted that the flows reported with the Jan 2011 application have been substantially reduced when compared to flows listed in the 2005 permit fact sheet. Can you provide some clarification as to why the flow have changed?
Outfall 002 long term average: 0.210 MGD vs 0.178 MGD
Outfall 995 max 30 day average: 7.1 MGD vs 3.188 MGD
long term average: 5.64 MGD vs. 2.377 MGD
- 16) In the Form2C application, Part II B, Outfall 002: Under treatment, the code for disinfection (2-H) is listed. With the proposed changes, do you intend to keep the UV or other disinfection method as part of the treatment? My understanding was that everything after the ammonia strippers was being removed.
- 17) In the Form 2C application, Outfall 002 Part V A.1.c: No data for TOC was submitted. Please provide information regarding TOC. If you believe that there has been no changes at the plant that would affect the TOC concentrations, you can submit data from the previous application.
- 18) In the Form2C application, Outfall 002 Part V B.1.k: No data for Sulfate was provided but is marked as believed present. Please reconcile.
- 19) In the Form2C application, Outfall 995 Part V A.1.a-e: Max 30 Day and Long Term Average were left blank. If this information is available, these fields should be completed.
- 20) In the Form2C application, Outfall 995 Part V B.1.d: The box is marked as believed absent, however, a concentration of fecal coliform is reported (340 CFU/100mL). Please reconcile.

Other Questions

- 21) Does Omega receive any waste products from seafood processors? We received a registration statement for the Seafood General Permit that indicated that waste was sent to Omega. Upon following up with the owner, it turns out that they in the past their waste went to Omega but doesn't anymore.
- 22) How many fishing vessels does Omega operate? What is the capacity of the fish holds on each?

Let me know if you have any questions. I am still reconciling a few issues found during the internal QA/QC but hope to have the draft to you soon.

Jaime

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